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OTAY

Final Environmental Impact Statement

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United States Department of the Interior
Bureau of Land Management
CALIFORNIA DESERT DISTRICT

March 3, 1849

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
California Desert District
1695 Spruce Street
Riverside, California 92507

IN REPLY
REFER TO:

1792
(C-064)

Dear Reviewer:

Enclosed for your review and comment is the Otay Final Environmental Impact Statement prepared on proposed grazing management for the Escondido Project Area of the California Desert District, California.

The statement was prepared pursuant to Section 102 (2) (c) of the National Environmental Policy Act of 1969. It is based on information from the Bureau of Land Management and other sources, including Federal, State, and local agencies, and interested private organizations and citizens. As no concerns raised during the public review of the draft EIS required major revisions of the document, the final EIS has been prepared in an abbreviated format consistent with provisions of Section 1500 of 40 CFR, the Council on Environmental Quality's regulations for the implementation of NEPA. The final EIS includes all comments received during the public review, responses to each comment, and required modifications of the text. This document should therefore be used in conjunction with the previously published draft EIS.

Comments on the environmental statement should be received by this office no later than , in order to be considered in the subsequent decision process. Your comments should be returned to:

Otay Grazing EIS
c/o District Manager
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, California 92507

Sincerely,

Gerald E. Hillier
District Manager

Enclosure

880/3416

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DEPARTMENT OF THE INTERIOR

OTAY GRAZING

FINAL

ENVIRONMENTAL IMPACT STATEMENT

Prepared By

BUREAU OF LAND MANAGEMENT

DEPARTMENT OF THE INTERIOR

Ed Hastey

STATE DIRECTOR, CALIFORNIA STATE OFFICE

Bureau of Land Management
Library
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Denver, CO 80225

OTAY GRAZING
ENVIRONMENTAL IMPACT STATEMENT

Type of Action: ( ) Draft (X) Final Environmental Impact Statement

(X) Administrative ( ) Legislative

For Further Information Contact:

Escondido Project Manager
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, California 92507

Responsible Agency:

US Department of the Interior
Bureau of Land Management
California State Office

Location of Action: Parts of the following Counties in Southern California:

Los Angeles
Riverside
San Diego

Scope: This final environmental impact statement is a broad scope analysis of the proposed Otay Grazing Management Plan. Environmental assessments will be prepared on allotment management plans and range improvement projects as appropriate.

Abstract: The Otay Grazing Environmental Impact Statement analyzes effects of livestock grazing on approximately 55,000 acres of public land. The proposed action and three management alternatives presented have been analyzed in terms of their economic, social, and environmental effects. Major impacts of the proposed action include reintroduction of successional stages of vegetation in chaparral areas identified for prescribed burning and potential impacts on rare, threatened, and endangered plants.

Location to which comments must be sent:

ATTN: Otay Grazing EIS
Gerald E. Hillier
California Desert District Manager
1695 Spruce Street
Riverside, California 92507

SUMMARY

This EIS examines four alternatives:

1. Proposed Action (Continue Present Management)
2. Increased Livestock Grazing
3. Decreased Grazing
4. No Grazing

Concerning Livestock Grazing:

1. On 55,000 acres
2. In the California Desert District, Escondido Project Area

General Land Use Goals Are:

1. Reduce hazardous fuel loads
2. Protect archaeological, historic, wildlife, and wilderness resources as required by law
3. Protect rare, threatened, and endangered plants

No significant issues concerning livestock grazing have been identified.

TABLE S-1
ALTERNATIVE AND IMPACT SUMMARY

Major Actions	Existing Situation	Proposed Action	Livestock Increased	Decreased Livestock Grazing	No Grazing
ALLOTMENT CATEGORIES					
Intensive Allotments	0	6	15	6	--
Custodial Allotments	28	22	22	6	--
FORAGE ALLOCATIONS (AUMs)					
Livestock	4378	4378	5848	3972	0
RANGE IMPROVEMENTS NEEDED					
Fences (miles)	5	5	35	5	0
Springs	8	8	20	8	0
Reservoirs	2	2	4	2	0
Prescribe burn (acres)	5,000	5,000	20,000	5,000	0
Impacts					
AUM Increase after burning	0	987	5,687	987	0
RARE PLANTS					
No. Species Potentially Highly Susceptible to Impact From:					
- Grazing	7	7	9	7	0
- Fire	0	7	10	7	0
SOCIO-ECONOMIC					
No. operators substantially impacted (Class I Allotments) (+/-)	0	+2	+2	+2	-3

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Chapter 1

Consultation/Coordination

CHAPTER 1
CONSULTATION AND COORDINATION

PUBLIC AND AGENCY INVOLVEMENT

Four public meetings were held in April 1981, to sample the public's opinion on possible transfer of remote and difficult-to-manage parcels of land lying outside the CDCA. Input from the public relating to the Otay Grazing EIS was also solicited.

Among the few comments which were made at the meetings relating to the grazing aspects of the public lands were: 1) the Soil Conservation Service should be invited to advise on the possible impacts from erosion, 2) few, if any, of the specific grazing operations were known to have unacceptable adverse impacts, such as negative effects upon endangered plant species, and 3) operators presently grazing subject lands should be given first preference if those lands were eventually to be traded or sold to the public.

In summation, all but one of those attending did not see grazing as a significant issue or problem.

The Draft EIS was released for a 45-day public review on January 7, 1983. Eleven written comments were received during that time. The comments received on the Draft EIS has been addressed and included in this Final EIS. The District Manager next has the responsibility for preparing proposed grazing decisions from the Final EIS and additional comments received. These proposed decisions will be subject to public review and consultation before final decisions are made and implementation is begun.

AGENCIES AND ORGANIZATIONS TO WHOM COPIES OF THIS DOCUMENT ARE BEING SENT

Federal

Environmental Protection Agency

Advisory Council on Historic Preservation

U.S. Department of the Interior
    Bureau of Mines
    Bureau of Reclamation
    Geological Survey
    Fish and Wildlife Service
    Bureau of Indian Affairs
    Mineral Management Service
    Natural Resource Library

U.S. Department of Agriculture
    Environmental Quality Affairs
    Forest Service
    Soil Conservation Service
    Animal Health Services

U.S. Senators (California)

U.S. House of Representatives (Escondido Project Area)

Department of Commerce

Department of Justice
    Border Patrol
    Customs

Department of Treasury

California - State Agencies

Office of the Governor

Office of Planning and Research (Clearinghouse)
    The State Clearinghouse will distribute copies of the FEIS to several appropriate State Agencies.

State Historic Preservation Office

Resources Agency

    Department of Water Resources
    Air Resources Board
    Division of Mines and Geology
    Division of Oil and Gas
    Division of State Lands
    Native American Heritage Commission Service
    Department of Fish and Game
    Department of Parks and Recreation
    Department of Forestry

University of California at Los Angeles, Department of Biology

University of California at San Diego

Muir College

San Diego State University

California - Local Agencies

Riverside County Board of Supervisors

Riverside County Planning Department

Riverside County Department of Fire Protection

Riverside County Parks Department

San Diego County Board of Supervisors

San Diego County Office of Fire Services

San Diego County Department of Planning and Land Use

San Diego County Parks and Recreation

San Diego County Air Pollution Control

San Diego Agricultural Commissioners Office

San Diego County Farm Advisor

San Diego Association of Governments (SANDAG)

Other Organizations

Natural Resources Defense Council, Inc.

Sierra Club

California Native Plant Society

Audubon Society

Desert Bighorn Council

Wilderness Society

California Wildlife Federation

San Diego Cattlemen's Association

American Motorcyclist Association, Distict 38

Boy Scouts of America

San Diego County Archaeological Society

Pacific Crest Trail Blazers

Desert Protective Council

Citizens ORV Committee

Southwestern Prospectors and Miners

Nature Conservancy

California Association of 4 Wheel Drive Clubs

California Off Road Vehicle Association

California Desert District Grazing Advisory Board

Desert Area Research Team

United States Department of Agriculture
Forest Service
Cleveland National Forest
880 Front Street, Room 6-S-5
San Diego, CA 92188

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Reply to: 1920

Date: January 17, 1983

Bureau of Land Management
ATTN: Mr. Gerry Hillier
Otay Grazing EIS
c/o District Manager
1695 Spruce Street
Riverside, CA 92507

Dear Gerry:

Thank you for the opportunity to comment on the Otay Grazing Environmental Impact Statement (EIS). Your Resource Staff should be commended for the coordination efforts with the Cleveland National Forest Resource Staff. Overall, the document would be acceptable to the Cleveland National Forest, upon clarification of some areas of concern.

Page 2-4: Alternative 1 - Proposed Action
The last paragraph indicates Table 2-3 as the Proposed Action. I believe you mean Table 2-2 (page 2-11). I don't feel the Forest Service could commit itself to this kind of project implementation program, considering the state of the economy and federal budget constraints.

1-1 However, regardless of which alternative would be implemented, the identified costs (page 2-11) appear too low (based on Forest Service cost). This could have a serious impact on the Forest Service's ability to accomplish the projects should we take over administration of those lands.

Page 2-10: Specifications for Range Developments
Should the Forest Service take over administration of these lands, the range improvements would have to be done to Forest Service specifications.

Page 4-2: Vegetation
1-2 The discussion on forage availability should state more clearly (i.e., 2,5,10 years etc.) the estimate of time that forage is available to livestock following the treatment of chaparral. Also, the discussion of maintenance needs, following prescribed burning, should be made a little clearer. In other words, is the plan to maintain treated lands? What is the cost? This is important when determining cost effectiveness.

Page 4-3: Table 4-1
1-3 Is the quantification of forage allocation after burning based on collected data from the area? Or from literature cites? If the data was collected locally, the methodology should be discussed and the production values identified somewhere in the document.

Sincerely,

Ralph C. Cisco

RALPH C. CISCO
Forest Supervisor

1

Response to Forest Service

Response 1-1

The reasons for the cost discrepancy is that the Forest Service is addressing total cost, including planning, support, and labor. The estimates shown on page 2-11 have been adjusted to show total cost based on Forest Service cost (see Chapter 2, Modifications and Corrections).

Response 1-2

During the first year following burns no livestock grazing would be executed. During the next 9 years the forage production would steadily decline because of brush and shrub reestablishment. If no maintenance of prescribed burns occurred, after approximately the tenth year livestock use of an area would become minimal. Therefore, maintenance is planned for burned areas every ten years with an estimated cost of $25 per acre. Page 4-2 and tables 2-2, 2-3 and 2-4, have been revised to discuss a maintenance program (see Chapter 2, Modifications and Corrections).

Response 1-3

The estimate of forage allocated after burning was based on information gathered from experience in Eastern San Diego County. On reexamination, we have concluded that a more accurate allocation would be approximately 5 AUMs per acre burned based on Forest Service experience in similar vegetation types. Tables 2-5, 4-1 and 4-4 have been revised accordingly (see Chapter 2, Modifications and corrections, and for Table 2-5, see Table S-1).

Natural Resources Defense Council, Inc.

25 KEARNY STREET
SAN FRANCISCO, CALIFORNIA 94108
415 421-6561

Washington Office
1725 I STREET, N.W.
SUITE 600
WASHINGTON, D.C. 20006
202 223-8210

New York Office
122 EAST 42ND STREET
NEW YORK, N.Y. 10168
212 949-0049

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DISTRICT OFFICE
RIVERSIDE, CA.

January 26, 1983

Gerald Hillier, District Manager
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

Re: Otay Draft Environmental Impact Statement

Dear Mr. Hillier:

As you know, the Bureau of Land Management (BLM) is required to prepare environmental impact statements (EISs) which analyze the effects of existing and proposed livestock grazing on specific areas of the Public Lands in order to comply with the National Environment Policy Act of 1969. See NRDC v. Morton, 388 F. Supp. 829 (D.D.C. 1974). This requirement presumes, of course, that the BLM will continue to exercise jurisdiction over the lands involved and the uses made of them, including livestock grazing. While the Bureau assumed it would retain jurisdiction over the Escondido Project Area when the EIS schedule was originally established and subsequently amended, it now wishes to transfer the lands to other jurisdictions, including the Forest Service. See DEIS, p. 2-4. As we indicated when the Bureau's intention to transfer the lands was first made known to us, we believe that this change in circumstances obviates the need for BLM to prepare a grazing EIS on these lands. Although BLM has chosen to promulgate a DEIS, the document's usefulness is undermined by the fact that, although the alternatives considered were "developed with the concurrence of the Forest Service," DEIS, p. 2-4, that agency has made only the vaguest commitment regarding the document's use, and none at all regarding the available management options, including monitoring. Under these circumstances, we see little merit in detailing the ways in which the draft fails to comply with the standards to which we hold all other grazing EISs.

Sincerely,

Johanna H. Wald

David B. Edelson   Johanna H. Wald

JHW/DBE:klw

73
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March 3, 1849

United States Department of the Interior

BUREAU OF RECLAMATION
LOWER COLORADO REGIONAL OFFICE
P.O. BOX 427
BOULDER CITY, NEVADA 89005

IN REPLY REFER TO: LC-154A
120.1

JAN 31 1983

Your reference:
1972 (C-064)

Memorandum

To: District Manager, California Desert District, Bureau of Land Management, 1695 Spruce Street, Riverside, California 92507

From: Acting Regional Environmental Officer

Subject: Otay Grazing Draft Environmental Impact Statement (District Manager's letter of December 29, 1982)

We have reviewed the subject document and find no impact on Bureau of Reclamation activities. The document appears adequate for the purposes intended and no deficiencies or errors significant enough to comment on where noted.

William E. Rinne

3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

FEB 8 1983

Mr. Gerald Hillier
District Manager
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

Dear Mr. Hillier:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (EIS) titled OTAY GRAZING. We have no comments on this Draft EIS.

We have classified this Draft EIS as category LO-1. Definitions of the categories are provided by the enclosure. The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this Draft EIS. Please send three copies of the Final EIS to this office at the same time it is officially filed with our Washington D.C. office. If you have any questions, please contact Mr. Rick Hoffmann, Acting Chief, EIS Review Section, at (415) 974-8191 or FTS 454-8191.

Sincerely yours,

Charles W Murray

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy, Technical and
Resources Management

Enclosure (1)

EIS CATEGORY CODES

Environmental Impact of the Action

LO—Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER—Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EU—Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1—Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2—Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3—Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

United States Department of the Interior
GEOLOGICAL SURVEY
RESTON, VA. 22092

In Reply Refer To:
EGS-Mail Stop 423

FEB 10 1983

Memorandum

To: District Manager, Bureau of Land Management
Riverside, California

From: Assistant Director for Engineering Geology

Subject: Review of draft environmental statement for Otay grazing management plan, Escondido Project Area, California Desert District, Riverside, San Diego, and Los Angeles Counties, California

We have reviewed the draft statement as requested in your notice of December 29.

5-1 We suggest that the discussion of the affected environment (p. 3-1 through 3-14) should describe the water resources of the project area; and the evaluation of management alternatives (p. 4-1 through 4-13) should include assessment of impacts on the water resources.

for James F. Devine

Response to Geological Survey

Response 5-1

The most significant water-related impacts are those related to erosion. These are described under the "Soils" Section.

UNITED STATES GOVERNMENT

memorandum

In Reply Refer to:
Natural Resources

DATE: FEB 10 1983

REPLY TO ATTN OF: Assistant Area Director-Resources, Sacramento Area Office, Bureau of Indian Affairs, Sacramento, CA

SUBJECT: Otay Draft Environmental Impact Statement, Grazing Management, Escondido Project Area, California Desert District, California (DES 82/79)

TO: District Manager, California Desert District, Bureau of Land Management, Riverside, CA

As requested, we have reviewed the material related to the subject project and found no adverse impacts to any Indian lands under the jurisdiction of this office.

Eddie S. Edwards

6

OPTIONAL FORM NO. 10
(REV. 1-80)
GSA FPMR (41 CFR) 101-11.6
5010-114

☆ GPO : 1981 0 - 341-526 (6534)

Defenders
OF WILDLIFE

February 21, 1983

Otay Grazing EIS
c/o Gerald E. Hillier
District Manager
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

Dear Mr. Hillier:

Defenders of Wildlife submits this letter as our comments and recommendations with respect to the Otay Draft Environmental Impact Statement (DEIS) relating to proposed grazing management for the Escondido Project Area.

We are disappointed with the DEIS's coverage of three important subjects: riparian habitat protection (especially as it affects the Least Bell's Vireo), Stephen's Kangaroo Rat, and consideration of impacts on rare and endangered plant species. While the DEIS concedes the importance of these three subjects, it does not provide adequate information to determine likely overall impacts, nor inform the reader of the level of inventories which occurred. For example, on page 3-6, the DEIS indicates that individual pairs of Least Bell's Vireo "... may be found in isolated riparian sites." The DEIS admits that this Vireo and other songbirds rely on riparian habitats, and "This habitat type is especially susceptible to alteration by grazing" (page 3-11). Unfortunately, the DEIS states that "no fencing of riparian habitat is proposed," and "No major riparian areas are known to occur in any of the allotments" (page 4-4).

7-1 A number of questions arise. What does BLM consider a "major" riparian area? Are there one or more "minor" riparian areas within current or proposed allotments? Was each allotment inventoried on a precise, site-specific basis for the presence of riparian vegetation or Least Bell's Vireos? Without answers to these key questions, we cannot reasonably comment on the adequacy of the DEIS, nor whether fencing may indeed be necessary.

7-2 Map 2-3 indicates that grazing allotments may affect or abut several possible water sources, such as may be located in Iron Spring Canyon, Previtt Canyon, McAlmond Canyon, Campo Creek, and Smith Canyon. Lacking site-specific descriptions, we do not know whether these areas contain surface water and, if so, what level of riparian vegetation they could or do support. We respectfully request that the above questions be thoroughly answered, and the presence of any riparian vegetation disclosed.

7

1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510

7-3 We have similar concerns with respect to the Stephen's Kangaroo Rat. Map 3-1 indicates that 3 existing and 3 proposed allotments occur within this species' range. But on page 4-6 the DEIS states, "It is not known whether or not the species is actually present on any of these allotments." In addition, there is no discussion of this species' food habits, whether competition may exist with livestock grazing, and,if so, what general level of forage utilization would ensure the continued health of existing populations. We believe BLM has an affirmative duty to properly inventory these allotments. If this species _is_ present, a detailed analysis of possible grazing impacts should be provided, as well as BLM's plans to avoid or mitigate any such impacts.

7-4 Finally, Table 2-5 indicates that from 7 to 12 rare or endangered plant species would be highly susceptible to impacts from grazing and fire under all of the DEIS alternatives, _except_ the No Grazing Alternative. This demonstrates the failure to present a reasonable balance or array of alternatives in the DEIS. Indeed, the plant impacts under both the Proposed Action and Decreased Livestock Grazing Alternative are _identical_. Since it is doubtful that BLM will adopt the No Grazing Alternative, we hope that BLM will use its best efforts to reduce these adverse impacts on rare and endangered plants.

Thank you very much for considering our views.

Sincerely,

Richard Spotts
California Field Representative
Defenders of Wildlife

5604 Rosedale Way
Sacramento, CA 95822
(916) 442-6386

RS/bc

P.S. Please send us a copy of the final EIS. Thank you.

Response to Defenders of Wildlife

Response 7-1

The allotments were not surveyed on a site-specific basis for the presence of riparian vegetation (see also Response 11-9 below). The level of grazing prescribed was judged to not warrant the expense of fencing unless a special species of concern was present. As noted on page 3-6 of the DEIS, no Least Bell's Vireos have been reported breeding within the allotments based on recent surveys of potential sites within Southern California (Goldwasser 1978). However, future surveys may identify nesting sites; such a survey is currently being organized for the Spring of 1983 by the Least Bell's Vireo Working Group. If vireo breeding sites are discovered on this or any subsequent surveys, protective measures, such as fencing of livestock, will be considered.

Response 7-2

Specific conflicts between livestock and wildlife will be evaluated in the allotment management plans to be written for each of the Class I allotments. Details of projects and other solutions to conflicts will be described then.

Response 7-3

The various inventories conducted for the Stephen's kangaroo rat are listed on page 3-9 of the DEIS. These are judged to be sufficient to delineate the general distribution. This does not preclude that the kangaroo rat occurs elsewhere, but identifying every locale would require an intensive trapping program whose expense is not warranted under the low levels of grazing proposed.

Response 7-4

Table 2-5 indicates how many plants are potentially susceptible to impact; in other words, the number of species found in grazed areas.

Specific adverse impacts on rare and endangered plants will be reduced in a number of ways. Most of the rare plants are located in relatively specific locations. Livestock can be kept from these areas, by fencing sensitive sites if necessary. Such specific measures will be identified by allotment management plans prepared for each of the Class I allotments.

DART
DESERT AREA
RESEARCH TEAM

Reply to: Richard T. Gochnaur
8202 Vista del Rosa
Downey, Ca. 90240

Otay Grazing EIS
c/o Gerald Hillier
Distraict Manager
California Desert District
Bureau of Land Management
1695 Spruce St.
Riverside, Ca. 92507

February 20, 1983

Sir,

Thank you for this opportunity to comment on the draft EIS for the Proposed Livestock Grazing Management program for the Otay area.

We have reviewed the subject document, and other pertinent materials, and believe that the Proposed Action (Continue Present Management) is an acceptable and appropriate course of action. We endorse its adoption.

Please keep us informed of further developments in this area.

Sincerely,

Richard T. Gochnaur
Richard T. Gochnaur
Director

8

Resources Building
1416 Ninth Street
95814

(916) 445-5656

Department of Conservation
Department of Fish and Game
Department of Forestry
Department of Boating and Waterways
Department of Parks and Recreation
Department of Water Resources

GEORGE DEUKMEJIAN
~~XXEDMUNDXGXXBROWNXJRX~~
GOVERNOR OF
CALIFORNIA

THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO, CALIFORNIA

Air Resources Board
California Coastal Commission
California Conservation Corps
Colorado River Board
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and Development Commission
Regional Water Quality
Control Boards
San Francisco Bay Conservation
and Development Commission
Solid Waste Management Board
State Coastal Conservancy
State Lands Commission
State Reclamation Board
State Water Resources Control
Board

Mr. Gerald E. Hillier
Bureau of Land Management
California Desert District
1695 Spruce Street
Riverside, CA 92507

February 22, 1983

Dear Mr. Hillier:

The State has reviewed the Draft EIS, Proposed Livestock Grazing, Otay, submitted through the Office of Planning and Research in accord with OMB Circular A-95 and the National Environmental Policy Act of 1969. Review was coordinated with the State Lands Commission, Air Resources and Water Resources Control Boards, and Departments of Boating and Waterways, Conservation, Fish and Game, Forestry, Parks and Recreation, Water Resources, Food and Agriculture, Health, and Transportation.

The Department of Conservation has the following comments and recommendations to offer.

The Department believes that additional possible impacts should be added to those identified in the report:

1. Most sedimentation that results from land conversion activities, including prescribed burning, originates as wash from dry landslide debris. These landslides often occur as a result of equipment operations on unstable slopes or over hazardous geologic formations. Therefore, induced mass movement and the resultant sedimentation should be identified as a potential negative project impact.

9-1

2. Wind erosion of top soil following a burn, or other vegetative disturbance related to type conversion activities, can be a significant environmental impact.

3. Loss of soil through mass wasting, sheet and rill erosion, and wind erosion can reduce soil fertility and water-holding capacity. This degradation, in turn, can significantly reduce the soil's capacity to support productive vegetative growth--one of the primary benefits of prescribed burning.

The report does not include a mitigation program to deal with the negative environmental impacts discussed above. Although the report states that the project would only be implemented following site analysis and the development of a burn plan, no information on the burn plan is provided to ensure that potential soil damage would be mitigated.

9

The Department recommends that a model burn plan, with mitigating measures that address the above mentioned impacts, be included as part of the final EIS. Further, the Department also recommends that BLM consult the California Department of Forestry's Chaparral Management Program Final EIR, particularly pages 132 - 133 and H-1 through H-6 for possible measures to mitigate the adverse impacts on soil of chaparral burning. The more important of these measures include:

1. Revegetate, seed, and/or mulch burned slopes.
2. Avoid disturbance of slopes that present geologic hazards.
3. Keep burn areas well distributed, with undisturbed areas between.
4. Maintain vegetative buffers between burn areas and water courses and roads.
5. Avoid large burns on coarse, dry shallow soils, because these soil types seem more prone to developing water repellency than finer soils.
6. Windraw brush along contours to form berms that act as impediments to overland water runoff.

9-2

9-3 The Department of Parks and Recreation comments that the project is subject to provisions of the National Historic Preservation Act of 1966. Documentation should be sent for review and comment before a final EIR is prepared to the Department's Office of Historic Preservation, 1225 K Street, Sacramento 95814.

Sincerely,

Harold F Waraas

HAROLD F. WARAAS
Assistant Deputy Secretary

cc: Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814
(SCH 83010506)

Response to Resources Agency

Response 9-1

We agree with your comment and have considered those possible impacts. However, we feel they are relatively minor, and that the most significant impact would be the runoff and water erosion problems described in the text.

Response 9-2

A thorough allotment management plan and a site-specific environmental analysis will be completed prior to actual construction or treatment phase (p.2-4). For those allotments requiring prescribed burning a burn plan will be incorporated in the allotment management plan following guidance from the California Department of Forestry's Chaparral Management Program Final EIR, the Laguna - Morena Demonstration Area's Managing Chaparral, and the Bureau of Land Management Draft Manual 9215 Prescribed Burning.

Response 9-3

No on-the-ground survey was conducted. Information in the Draft EIS was based upon the Class I overview for San Diego County conducted by Wirth and Associates in 1977. A copy of that report has been sent to the Office of Historic Preservation.

THE CALIFORNIA NATIVE PLANT SOCIETY

DEDICATED TO THE PRESERVATION OF CALIFORNIA NATIVE FLORA

San Diego Chapter, P.O. Box 1390 San Diego, CA 92112

February 18, 1983

Otay Grazing EIS
c/o District Manager
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

Dear Sirs:

The San Diego Chapter of the California Native Plant Society has reviewed your Otay Grazing Plan EIS. We would like to state our position regarding land under review for the grazing plan and our concerns regarding your proposal.

The Goal of the California Native Plant Society is the protection of the Native California Flora. We are particularly concerned with management of areas with sensitive resources in order to protect those resources. The California Native Plant Society generally feels that natural resources on public land may be the only resources left in Southern California if current trends continue for the development of the landscape. Natural Resources on public lands represent the heritage for future generations and should be used wisely.

The Otay Grazing Plan proposal appears to be biased toward increasing forage production and cattle grazing without complete consideration for the sensitive species. Otay Mountain is a good example of this. It is known to contain a very large number of sensitive and rare and endangered plants, yet it not only contains a grazing lease already, but it has the potential for expansion of grazing land. This mountain contains the worlds largest stand of tecate cypress. While the proposed action alternative does not include expansion of the grazing area, it does involve controlled burns for forage production. Such management will likely result in adverse impacts to the cypress due to fires occuring too frequently and could even involve the invasion of sensitive habitats with non-native forage species. With Otay Mountain representing a well known diverse and unique vegetation, it should be managed to protect those resources.

Otay Mountain is just one example of a sensitive area that could be impacted by the grazing plan. The resources of some other areas such as Rodriguez Mountain and the Jamul Mountains have not yet been surveyed as intensely as Otay Mountain, but do contain some rare species of plants. Such areas should also be managed for the sensitive resources instead of increased

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cattle grazing. Overall, we recommend that the grazing plan not include Otay Mountain because of the sensitivity of its vegetation. Further, we recommend that no increase in grazing levels take place if the areas have the potential for sensitive resources to be affected by controlled burns, invasion of non-indigenous forage species, or intense grazing pressure. Thank you for the opportunity to comment.

Sincerely,

Response to the California Native Plant Society

Thank you for your general comments on the proposed livestock management of public lands in this area. Your comments will be considered during the final decision-making process.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Lloyd 500 Building, Suite 1692
500 N.E. Multnomah Street
Portland, Oregon 97232

Memorandum February 23, 1983

To: Gerald E. Hillier, California Desert District Manager
Bureau of Land Management, Riverside, CA

From: Regional Director (AE), Portland, OR

Subject: Otay Grazing dEIS

We have reviewed the Otay Grazing Draft Environmental Impact Statement (dEIS), and submit the following comments.

GENERAL COMMENTS

The DEIS appears weak in the wildlife section of Chapter 3 and inadequate in the analysis of potential impacts upon rare, threatened, and endangered plants and impacts upon wildlife.

SPECIFIC COMMENTS

11-1 Page 3-6, Least Bell's Vireo. The report states that no vireo breeding populations are listed for BLM-administered lands within the project area. This does not mean, however, as alluded to in the dEIS, that vireos do not occur there or that suitable or potential habitat does not exist. It should state whether any riparian habitats within the project area have been surveyed for vireos.

11-2 Page 3-9, Stephen's Kangaroo Rat. Three existing and three proposed allotments are located within or adjacent to the range of the Stephen's kangaroo rat. Information should be presented to indicate whether there is suitable habitat for the kangaroo rat. Also, attempts to locate Stephen's kangaroo rats within the project area should be indicated.

11-3 Page 3-11, Non-Game Wildlife. The dEIS mentions that there are reptiles of interest whose entire distribution in the U.S. is within the project area. The species and their population status should be stated.

11-4 Page 4-4, Rare, Threatened, and Endangered Plants. This section is weak. More information should be provided on each species potentially impacted by the various alternatives. Information such as the known range and population level of each species and the percentage of each likely to be affected by the project should be included. Opportunities or methods to protect significant populations from fire or grazing impacts should also

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be discussed. If there is little known about certain species, studies should be initiated to generate enough information to base rational management decisions that will not jeopardize these species. The mere inclusion of a "laundry" list of candidate plants does not address the problems and solutions of a fuel management program on the "endangered" flora.

11-5 Table 4-2 gives projections of potential use, grazing damage, and fire impacts. No citations were provided for this table nor how these data were derived. The derivation of the data should be stated.

11-6 Certainly all plants within an area of a burn will be lost, with sprouting lignotubers and seed the methods of re-establishment. Determining the long-range effects, however, will take study and time. Nonetheless, some of these "guesses" are questionable in Table 4-2. For example, why are the effects "low" for Calamagrostis densa while Cupressus stephensonii is "high"? The species grow together at King Creek in San Diego County.

11-7 Page 4-4, Wildlife. Golden eagles and mountain lions are included in Chapter 3 of the report as significant wildlife species. The potential impact of the project upon these species should be discussed. Likewise, the potential impacts to the reptiles of interest discussed in Chapter 3 should also be assessed.

11-8 The report states that if least Bell's vireo nests are discovered, protective measures would be taken to prevent degradation. The report should state what measures will be taken to find vireo nests. It would seem appropriate that prior to leasing, potential vireo habitat should be surveyed during the breeding season by a qualified biologist to determine if vireos are present. If Bell's vireos are present, measures should be taken to prevent disturbance to the birds. Because of the serious threat to vireos posed by brown-headed cowbirds, and because the presence of livestock can attract cowbirds, livestock grazing, even if excluded from riparian zones, could still adversely affect vireos.

We recommend that the monitoring program outlined on page 2-16 be expanded to include censuses to measure cowbird population trends in areas with suitable or potentially suitable Bell's vireo habitat. These trends could be correlated with changes in livestock grazing patterns. Only through such studies will BLM be able to determine the effects of its grazing management program, and adjust it if necessary. The key to recovering least Bell's vireo is re-establishing populations throughout its former breeding range. Controlling cowbird parasitism and rehabilitating riparian areas, both of which are directly related to livestock grazing, are central to recovery efforts. Information on page 3-3 indicates that livestock grazing in the project area could cause substantial impact, in that "...the majority of livestock forage is found in the Mixed Riparian Woodlands."

11-9 One other point of confusion exists. On page 4-4 the report states that no major riparian areas are known to occur in any of the allotments. Yet on page 3-3 the statement is made that Mixed Riparian Woodlands are usually the most important vegetation type found in the larger Category I allotments. This apparent contradiction needs explanation.

SUMMARY

As stated previously, the dEIS seems weak in its treatment of impacts on sensitive plant and wildlife species. We would hope that these sections could be strengthened significantly so that enough information is presented in order to be able to make good management decisions regarding sensitive plant and animal species.

Questions regarding these comments may be directed to Gary Wheeler or Ralph Pisapia at (714) 831-4270, FTS 796-4270.

Sincerely yours,

Acting Regional Director

cc: CDFG, Reg. 5, Long Beach, CA

Response to Fish and Wildlife Service

Response 11-1

See response 7-1.

Response 11-2

See response 7-3

Response 11-3

Examples include leaf-toed gecko (rare), granite night lizard (common), granite spiny lizard (common), small-scaled lizard (uncommon), banded rock lizard (common), orange-throated whiptail (locally common), and red diamond rattlesnake (common) (Stebbins 1966; status from Ted Rado, BLM, pers. comm.). The range of some of these may extend slightly eastward out of the project area.

Response 11-4

Information regarding the location and range of specific rare plants is not published in public documents in order to protect the plants from illegal collection. Specific locations are in BLM files and are recorded with the Nature Conservancy Data Bank in Sacramento.

Response 11-5

References used in preparing table 4-2 are listed below. They were included in the "References" section of the Draft EIS, but were inadvertently left off the table. In many cases, closely related species and professional judgment were used to determine impacts from grazing and fire. References included:

Cheatham, N.H. and J.R. Haller. 1975. An Annotated List of California Habitat Types. University of California Natural Land and Water Reserves System.

Menke, J.W. and R. Villasenor. 1977. The California Mediterranean Ecosystem and its Management. In Proc. of the Symposium on Environmental Consequences of Fire and Fuel Management in Mediterranean Ecosystems. USDA, Forest Service. General Tech. Report WO=3. pp. 257-270.

Sampson, A.W. and L.T. Burcham. 1954. Cost and Returns of Controlled Brush Burning for Range Improvement in Northern California. California Department of Forestry. Sacramento, California.

Smith, J.P. Jr.; Cole, R.J.; and Sawyer, J.O. Jr. 1980. Inventory of Rare and Endangered Vascular Plants of California. Special Publication No. 1 (2nd Edition). California Native Plant Society. Berkeley, California.

Response 11-6

Calamagrostis densa is a deep-rooted perennial species with a large heavy base. It would benefit from any burning cycles that would remove old dead material each year. Therefore, any burn or grazing cycle would not affect the species.

Cupressus stephensonii is a very thin barked tree with a highly volatile crown. Any fires would remove the parent trees immediately. If another fire occurred in the area before the next generation became capable of producing seeds, the plant would be extirpated from that location. This has happened on Tecate Peak. Therefore, recurring fires would place this plant at extremely high risk.

Response 11-7

Livestock grazing has been shown to affect the species composition and relative abundance of rodents (Phillips 1939, Reid 1981) and lagomorphs (Flinders and Hansen 1975), which constitute a major portion of the diet of the referenced animals. These effects result largely from changes in vegetation structure. Since livestock have grazed throughout the region for many years, no change is anticipated. The proposed program of prescribed burning will be beneficial to deer which are a prey for mountain lions.

Livestock grazing may affect the relative abundances of reptiles, each species reacting differently to changes in vegetation composition and structure (Jones 1981). To predict the effect on each species listed (see 12-3) would be entirely speculation, however, most are associated with rocks and boulders and would presumably be affected very little.

Response 11-8

See response 7-1. The levels of grazing proposed will not significantly increase livestock presence in a region which already supports livestock grazing on private lands. The presence of cowbirds would be difficult to monitor on this small amount of public land scattered among private lands.

Response 11-9

The statement at the bottom of page 4-4 is only true with regard to the Least Bell's Vireo. There are canyon bottoms containing cottonwoods, sycamores, alders, and other trees typical of riparian woodland. These may be important to riparian wildlife species such as Black Phoebes or Lazuli Buntings. No habitat inventory delineating the locations of riparian woodland or any other vegetation community was conducted. Delete the last sentence of page 4-4.

Chapter 2

Modifications and Corrections

CHAPTER 2

MODIFICTIONS AND CORRECTIONS

Chapter 2, pages 2-11 and 2-12, tables 2-2, 2-3 and 2-4 are revised to read as follows:

TABLE 2-2
DEVELOPMENT AND MAINTENANCE COSTS
Alternative 1

ITEM	QUANTITY	ESTIMATED UNIT COSTS	TOTAL	ESTIMATED MAINTENANCE COSTS*	ESTIMATED LIFE OF PROJECTS (YEARS)
FENCES	5 miles	2000/mile	10000	500	20+
SPRING DEVELOPMENTS	8	1000	8000	1000	20+
CATTLE GUARDS	3	3000	6000	0	20+
WATER TROUGHTS	8	200	1600	0	20+
EARTHEN RESERVOIRS	2	1-4,000	5000	600	20+
PRESCRIBED BURNS	5,000 acres	$55/acre	275000	0	10+
TOTAL			305000	2100	

* - Maintenance cost will be assumed by operator benefited by project. Maintenace for prescribed burn would occur after a 10-year period at a cost of $25/acre to reburn.

TABLE 2-3
DEVELOPMENT AND MAINTENANCE COSTS
Alternative 2

ITEM	QUANTITY	ESTIMATED UNIT COSTS	TOTAL	ESTIMATED MAINTENANCE COSTS*	ESTIMATED LIFE OF PROJECTS (YEARS)
FENCES	35 miles	2000/mile	70000	3000	20+
SPRING DEVELOPMENTS	20	1000	20000	2300	20+
CATTLE GUARDS	8	3000	24000	0	20+
WATER TROUGHTS	25	200	5000	0	20+
EARTHEN RESERVOIRS	4	1-4,000	10000	1200	20+
PRESCRIBED BURNS	20000 acres	$55/acre	1100000	0	10+
TOTAL			1229000	6500	

* - Maintenance cost will be assumed by operator benefited by project. Maintenace for prescribed burn would occur after a 10-year period at a cost of $25/acre to reburn.

TABLE 2-4
DEVELOPMENT AND MAINTENANCE COSTS
Alternative 3

ITEM	QUANTITY	ESTIMATED UNIT COSTS	TOTAL	ESTIMATED MAINTENANCE COSTS*	ESTIMATED LIFE OF PROJECTS (YEARS)
FENCES	5 miles	2000/mile	10000	500	20+
SPRING DEVELOPMENTS	8	1000	8000	1000	20+
CATTLE GUARDS	2	3000	6000	0	20+
WATER TROUGHS	8	200	1600	0	20+
EARTHEN RESERVOIRS	2	1-4,000	5000	600	20+
PRESCRIBED BURNS	5,000 acres	$55/acre	275000	0	10+
TOTAL			305000	2100	

* - Maintenance cost will be assumed by operator benefited by project. Maintenace for prescribed burn would occur after a 10-year period at a cost of $25/acre to reburn.

Chapter 4, page 4-2, "Vegetation" is revised to read as follows:

"Vegetation

"Prescribed Burning

"Prescribed burning would reintroduce successional stages in chaparral on 5000 acres, improving these potentially grazing-suitable acres to suitable grazing-acres for approximately ten years following the burn.

"The successional species and rate varies in relation to location, slope, exposure, soils, and season of burn. Menke and Villasenor (1977) described this general successional pattern as follows:

"1. During the first 1-3 years, annual and biennial heraceous species, sprouters and brush seedlings cover the area. Species diversity is greatest at this time and decreases as succession continues. Sampson and Burcham (1954) estimated the grazing capacity for cattle in mixed chaparral after burning. These estimates were used as a data base for establishing the forage production figures shown in Table 4-1.

"2. The second stage is from 4-10 years and is marked by the absence of herbaceous species. Intermediate and permanent successional brush species are both present.

"3. From 15-30 years, the intermediate shrub species such as ceanothus begin to die. Chamise increases its dominance and the standing dead material begins to build up a heavy fuel load.

"The increased AUM's available for livestock identified in tables 4-1 and 4-4 would occur during the second and fifth years, with a decline in these numbers during the sixth through tenth year."

Chapter 4, Page 4-3, Table 4-1 is revised to read as follows:

TABLE 4-1
ANIMAL UNIT MONTHS AVAILABLE AFTER PRESCRIBED BURNING

Allotment Name	Allotment Number	Current Forage Allocation	Acres Identified for Burning	Estimated Potential Forage Allocation After Burning for Alternative
Beauty Mtn.	6009	1,452	1,000	1,952
Clover Flat	7012	715	1,000	1,215
Hauser Mtn.	7024	66	1,000	566
Otay Mtn.	7035	222	1,000	722
Potrero	7046	726	500	976
Tule Valley	6027	172	500	422
TOTAL		3,353	5,000	5,853

Chapter 4, Page 4-4, Last sentence should be deleted.

Chapter 4, Page 4-8, Table 4-4 is revised to read as follows:

TABLE 4-4
ANIMAL UNIT MONTHS AVAILABLE AFTER PRESCRIBED BURNING PROPOSED NEW ALLOTMENTS

Allotment Name	Allotment Number	Current Forage Allocation	Acres Identified for Burning	Estimated Potential Forage Allocation After Burning for Alternative
Alberhill	None	0	500	250
Anza Valley	None	0	0	100
Bautista Canyon	None	0	1,000	500
Chihuahua Valley	None	0	2,000	1,000
Lancaster Valley	None	0	1,000	500
Rodriques Mtn.	None	0	1,500	750
San Ysidro Mtns.	None	0	5,000	1,000
Soboba	None	0	4,000	600 *
Table Mtn.	None	0	0	0
TOTAL			15,000	4,700

* Unsuitable acres livestock grazing burned to provide for wildlife

References, Pages R-1 and R-2, is revised to read as follows:

REFERENCES

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